

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DELAWARE TRUST COMPANY, as TCEH :
First Lien Indenture Trustee, :

Plaintiff, :

-against- :

Case No. 1:15-cv-02883-PAE

WILMINGTON TRUST, N.A., as First Lien :
Collateral Agent and First Lien Administrative :
Agent, :

Defendant. :
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**TITAN INVESTMENT HOLDINGS LP'S
NOTICE OF MOTION TO INTERVENE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Affirmations of Ronit Berkovich and Joe Freedman and exhibits thereto, Titan Investment Holdings LP ("Titan") respectfully moves this Court, before the Honorable Paul A. Engelmayer, United States District Judge, United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on a date and time to be determined by the Court, for an Order granting Titan leave to intervene as a defendant in the above-captioned action as of right pursuant to Federal Rule of Civil Procedure 24(a) or permissively under Federal Rule of Civil Procedure 24(b), and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
April 24, 2015

Respectfully submitted,

By: /s/ Salvatore Romanello

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